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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

-against-

BANK OF CYPRUS  
PUBLIC COMPANY LIMITED,

Defendant.

Index No.: 07 CIV 9234 (CSH)

**REPLY DECLARATION OF JOHN FELLAS IN SUPPORT OF BANK OF CYPRUS  
PUBLIC COMPANY LIMITED'S MOTION TO DISMISS THE COMPLAINT**

JOHN FELLAS, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury  
as follows:

1. I am a partner in Hughes Hubbard & Reed LLP, attorneys for defendant  
Bank of Cyprus Public Company Limited (the "Bank") in this action. I am a member in good  
standing of the Bar of the State of New York and of this Court.

2. I submit this Reply Declaration in support of the Bank's Motion to  
Dismiss the Complaint on the basis of lack of subject matter jurisdiction, statute of limitations,  
and failure to state a claim. The purpose of this Reply Declaration is to put before the Court

copies of prior pleadings and other documents that are cited in the accompanying Reply Memorandum of Law in Support of the Bank's Motion to Dismiss.

3. Annexed hereto as Exhibit 1 is a true and correct copy of the press release dated January 30, 2008 from the United States Attorney for the Southern District of New York.

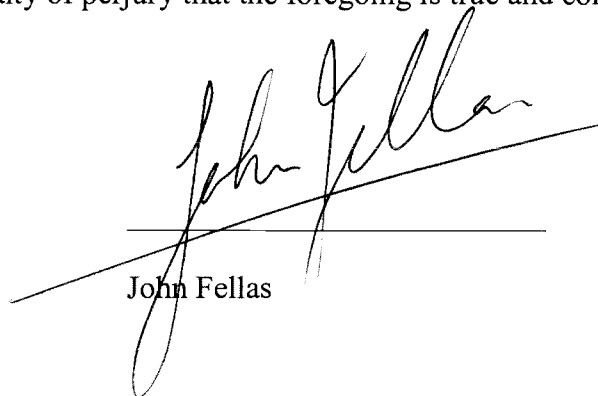
4. Annexed hereto as Exhibit 2 is a true and correct copy of the Indictment in *United States v. Bodmer*, 03 cr. 947 (August 5, 2003). The government cites to the decision in *United States v. Bodmer*, 342 F. Supp. 2d 176 (S.D.N.Y. 2004) at pages 12-13 of its opposition memorandum of law.

5. Annexed hereto as Exhibit 3 is a true and correct copy of the Indictment in *U.S. v. Lycourgis Kyprianou et al.*, 01 cr, 1177 (S.D.N.Y.) filed on June 24, 2002.

6. Annexed hereto as Exhibit 4 is a true and correct copy of a Memorandum dated October 10, 2001 from the Bank UK which is referred to in paragraph 84 of the complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 20th day of June 2008



John Fellas